STATE OF IOWA DEPARTMENT OF COMMERCE BEFORE THE IOWA UTILITIES BOARD

IN RE:

INTERSTATE POWER AND LIGHT
COMPANY

DOCKET NO. TF-2016-0322

CONDITIONAL OBJECTION

The Iowa Office of Consumer Advocate, a division of the Iowa Department of Justice, responds as follows to the tariff filing made by Interstate Power and Light Company (IPL) in the above-captioned proceeding on August 31, 2016:

IPL's proposed tariff responds to the Order issued by the Iowa Utilities Board (Board) on July 19, 2016, in Docket No. NOI-2014-0001, directing IPL and MidAmerican Energy Company (MEC) to file new net metering tariffs that will be effective for a three-year study period. The pilot net metering tariffs will be effective for all customers who file interconnection applications after the Board approves the new tariffs. Customers on the current net metering tariff shall have the option to remain under the current tariff or take service under the new tariff and participate in the study. If an existing customer chooses to take service under the new net metering tariffs, the customer cannot return to the existing tariff. (July 19 Order, p. 4).

IPL proposes to freeze its existing tariff to existing net metering customers at existing locations. The intent is to close the existing net metering rate for customers installing generation after January 1, 2017, the proposed effective date for the new pilot tariff. Any customer who submits a completed interconnection application prior to January 1, 2017, would be allowed to take service under the existing net metering tariff. OCA identified a number of significant issues in its response to IPL's proposed pilot tariff. OCA conditionally objects to the freezing of IPL's

net metering tariff for new customers pending a final and appropriate resolution of the issues presented in IPL's pilot net metering tariff.

Respectfully submitted,

Mark R. Schuling Consumer Advocate

/s/ Jennifer C. Easler Jennifer C. Easler Attorney

1375 East Court Avenue Des Moines, IA 50319-0063 Telephone: (515) 725-7200

E-Mail: IowaOCA@oca.iowa.gov

OFFICE OF CONSUMER ADVOCATE